BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA (MPA/USPS-4-13)

The United States Postal Service hereby provides its responses to the following interrogatories of Magazine Publishers of America: MPA/USPS-4-13, filed on March 17, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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MPA/USPS-4. Please provide any documentation or information available, including any documentation or information from the delivery redesign project, on the following:

- (a) Proportion of parcels delivered by city letter carriers that cause a non-routine delivery, i.e., the carrier must deliver the mail to a location other than the routine delivery point location.
- (b) Proportion of parcel deliveries where more than one parcel is delivered to an address.
- (c) Proportion of parcels delivered by city letter carriers that require the carrier to either interact in some way with the recipient or leave a written notice.
- (d) Guidelines on the type of parcels which -- or circumstances where -- the city letter carriers are required to physically hand to a customer rather than deliver to the normal mail receptacle.
- (e) Proportion of accountables delivered by city letter carriers that cause a non-routine delivery, i.e., the carrier must deliver the mail to a location other than the routine delivery point location.
- (f) Proportion of accountables on city letter routes where the carrier simply leaves a notice in the mail receptacle rather than delivers the accountable.
- (g) Circumstances under which the carrier does not have to conduct a transaction with a customer but rather can deliver it to the normal mail receptacle.

- (a) No data are available.
- (b) No data are available.
- (c) No data are available.
- (d) Carriers are to physically hand to a customer any mail, including parcels, which require a signature. Any mail, including parcels, that cannot be placed in the mail receptacle must be handed to the customer unless the customer has agreed a priori to some other process, for example, putting the mail behind a storm door. Often carriers hand mail directly to customers if they are outside, even though that practice is not required.

- (e) All accountables by definition require a customer signature and therefore are 'non-routine' deliveries.
- (f) No data are available.
- (g) In general, carriers are to deliver mail to the normal mail receptacle except as indicated in (d) and (e).

MPA/USPS-5. For all city delivery carrier letter routes for 1996 and 1998, please provide an estimate, and all available documentation, of:

- (a) The proportion of letters which were DPS.
- (b) The proportion of letters which were Sector Segment.
- (c) Any differences in (a) or (b) by route type.

RESPONSE:

(a) The proportion of letters that were DPS is provided below. Estimates are based on USPS FLASH data (End of Run reports and DSIS cased letter volumes).

<u>YEAR</u>		<u>PERCENTAGE</u>
1988	-	unavailable
1996	-	22.5%
1998	-	43.1%.

- (b) No estimates are available for Sector Segment.
- (c) No estimates are available by route type.

MPA/USPS-6. For all city delivery carrier letter routes for 1988, 1996, and 1998, please provide an estimate, and all available documentation, on:

- (a) The proportion of multiple delivery, central, dismount, or VIM room stops/deliveries which received no carrier in-office casing.
- (b) The amount of volume for such stops/deliveries.
- (c) The extent to which that volume has to be cased at the delivery point by a city carrier or is simply dropped off for another individual to distributed.
- (d) Whether the City Carrier Cost System (CCS) collects data on the types of stops and volumes in (a) and (b) above.

- (a) There are no data available by delivery type, stop type, or delivery mode that distributes those entities or the volume of mail in those entities by carrier casing or no carrier casing in a particular office.
- (b) There are no data available by delivery type, stop type, or delivery mode that distributes those entities or the volume of mail in those entities by carrier casing or no carrier casing in a particular office.
- (c) There are no data available by delivery type, stop type, or delivery mode that distributes those entities or the volume of mail in those entities by carrier casing or no carrier casing in a particular office. As such, there are no data available on the volume of mail in such entities that is simply dropped off for another individual to be distributed. While the City Carrier Cost System (CCS) provides various estimates for the multidelivery stop type, it does not provide the estimates requested in parts (a) and (b) above. The CCS did not collect data that allows for the estimates in (a) and (b) for VIM room stops/deliveries in 1988, 1996, or 1998.

MPA/USPS-7. Please explain the following, using current USPS definitions and distinctions for city letter routes:

- (a) Are Central or NDCBU mail receptacles ever served through a curbline delivery?
- (b) When the carrier uses a vehicle to at least partially access a stop, what are the differences among NDCBU, central, multiple-delivery 'other," and dismount deliveries?
- (c) When the carrier is on foot during the entire access to a stop, what are the differences among NDCBU, central, and multiple-delivery "other" deliveries?

- (a) Yes, on rare occasions.
- (b) NDCBU (neighborhood delivery and collection box unit) mail receptacles are owned by the Postal Service and are typically installed outside, opened with an arrow key, and are either front or back loaded and serve multiple customers. Centrals are very similar to NDCBU's in design but are privately owned and are more often installed inside (for example, an apartment house). The customers (or landlord) provide keys to the boxes. An example of a multiple delivery "other" is a bank of individual boxes that can be accessed at one stop. Typically, no keys are needed by the Postal service to place mail in the boxes, for example, 2 or more rural type curbside boxes at a stop or a bank of 2 boxes (usually at the door) used to service a duplex. The best way to describe a dismount is something between a park and loop and curbline. Typically, the satchel is not used because there are at most only a few delivery points before the carrier moves the vehicle to another park point. Often segments on business routes and residential routes with large distances between stops (often fenced or wooded) are dismounts.

(c)	Delivery types are not conditioned by mode of travel while accessing the stop.

MPA/USPS-8. For city delivery carriers with assigned letter routes, please provide for 1988, 1996, and 1998:

- (a) Their total Cost Segment 6 and 7 cost.
- (b) The proportions of time spent in-office and out-of-office.

RESPONSE:

(a) – (b) The requested data are presented in the table below. 1989 data have been substituted for 1988 data, since 1988 results are unavailable. Note that the total segment 6 (in-office) and total segment 7 (street-time) costs are the costs presented at the top of the 7.0.4.1 tabs presented in the FY 89, FY 96, and FY 98 segment 6/7 worksheets. Both cost totals exclude training costs. Also, clocking-in/clocking-out costs are included as office-time costs, and all relay costs are included as streettime costs.

	POSTAL FISCAL YEAR			
	1989	1996	1998	
Total Letter Route Segment 6 Cost (\$1,000)	3,243,292	3,376,902	3,537,633	
Total Letter Route Segment 7 Cost (\$1,000)	4,675,293	7,173,042	7,487,576	
Street-Time Proportion	59.04%	67.99%	67.91%	
Office-Time Proportion	40.96%	32.01%	32.09%	

MPA/USPS-9. For auxiliary assistance, please provide the following:

- (a) A definition of the term 'auxiliary assistance."
- (b) An explanation of the circumstances under which auxiliary assistance incurs out-of-office time.
- (c) An explanation of the circumstances under which auxiliary assistance incurs in-office time.
- (d) For the years 1988, 1996, and 1998, the total amount of city letter route carrier in-office and out-of-office time spent on auxiliary assistance.

- (a) Auxiliary assistance is temporary assistance to a carrier either in-office or on the street to compensate for either day to day mail volume fluctuations or other unforeseen circumstances that could cause overtime or service failures. To smooth these workload variations, the Postal Service often uses part time flexibles, casuals, or other regular carriers to either case or deliver part of the effected carrier's route. Note that an auxiliary route is a route that is regularly scheduled for completion in less than eight hours and is not up for bid by full time carriers. An auxiliary route can be carried by anyone, including a regular carrier working overtime (but not on his/her route).
- (b) Out of office assistance can occur from sheer mail volume. For instance, on a typical day, a carrier may deliver to only seventy percent of the potential stops. On the day of a special mailing, e.g., the census mailing, the carrier has to deliver to nearly all of the stops. To complete the delivery by the normal time, the carrier would need auxiliary assistance. As another example, suppose that a carrier delivers a motorized business route in a congested major city. When it rains, traffic slows to a crawl. The carrier would seek assistance because the drive time between stops would increase dramatically

- (c) Using the census example in (b) above, if the mail was not DPS, the carrier would have to case substantially more pieces than usual. If the carrier were to leave the office at the same time, auxiliary assistance would be necessary.
- (d) Given that auxiliary assistance to regular carriers on their regular routes can be provided by casuals, part time flexibles, or other regular carriers (see a. above), there is no way to separate auxiliary assistance from hours spent on auxiliary or regular routes.

MPA/USPS-10. For routers, please provide the following:

- (a) A definition of the term 'router."
- (b) An explanation of the circumstances under which a router is required for assistance to a city letter route carrier.
- (c) For the years 1988,1996, and 1998, the total amount of router time spent assisting city letter route carriers.

- (a) A router is a carrier craft employee who only has office duties. In other words, a city carrier craft employee who only cases mail with no street delivery duties.
- (b) Routers are used in support of carrier in-office operations. Typically, they are used to help carriers case their mail when carriers experience substantial increases in mail volume that effect in office time disproportionately. That is, pieces per stop and/or actual stops delivered receiving mail (coverage) increase without a corresponding increase in possible stops (customers to serve).
 Operations was faced with this problem during the late 80's and 90's as mail volume grew. Router labor was used to offset potential overtime (caused by variation in daily mail volume) or route adjustments (permanent increase in average daily volume). As the data provided in (c) shows, advances in DPS sorting have substantially reduced carrier letter casing times, and thereby, eliminated much of the need for in office assistance provided by routers.
 - (c) Costs for routers (LDC 29) are provided below:

YEAR	COSTS (SALARY)	<u>WORKHOUR</u> S	
FY 1988	no data	no data	
FY 1996	\$115,824,552	4,572,325	
FY 1998	\$ 74,163,577	2,825,999	

MPA/USPS- 11. Please refer to USPS Form 3999 shown in Appendix E of USPS-T-13 and explain the following:

- (a) The purpose of the form,
- (b) How the form is used.
- (c) When and how often the form is used.
- (d) How often the form is revised.
- (e) Who fills out the form.

- (a) This form is a recap of the delivery sequence file and is a tool that can be used during City Delivery Route Inspections. This form gives the Route Examiner a listing of the current possible delivery points currently on the route.
- (b) The Route Examiners may use this form when they accompany the carriers during a route inspection. As the examiner walks with the carrier, he will verify the actual number of possible delivery points that are on a route and indicate if the delivery point is serviced on the day of inspection. In addition to the number of possible and made deliveries the examiners will track the actual time used to service sector segments (ZIP+4 block ranges of deliveries). This collected data is used to determine the time value of the street territory during route structuring or adjustments.
- (c) As stated above, the primary use of the form is for collecting the street information needed during route inspections. This form can also be used for daily street management of the city delivery routes. Route Inspections are performed when the routes grow in workload (delivery points or volume) to a point where the carriers need additional time to complete the assignments.

(d) The elements on the form collected during the Route Inspection are negotiated with our unions and not changed on a regular basis.

(e) Delivery managers or Route Examiners.

MPA/USPS- 12. Please refer to USPS Form 3999 shown in Appendix E of USPS-T-13 and define and distinguish among the following terms and explain fully how each is measured:

- (a) Reference volume
- (b) Total cased volume
- (c) Total delivered volume

- (a) This is the normal amount of mail volume that the carrier has demonstrated can be handled in the office on an average day for that route. This amount is determined during the route inspection where mail volumes are counted for a week. The route is then configured as close as possible to create an eight-hour workday, four hours in the office and four hours on the street.
- (b) This is the normal amount of mail that the carrier will case (sort in the office) on an average day based on route inspection data. . See (a).
- (c) This is the normal total amount of mail that the carrier will handle and deliver on an average day based on route inspection data. See (a).

MPA/USPS-13. Please refer to USPS Form 3999 shown in Appendix E of USPS-T-13 and define and explain fully the following terms:

- (a) Allied Time
- (b) Net Delivery Time
- (c) PD's as Counted
- (d) Deliveries Made
- (e) PD's on 1621 c
- (f) Allied Function Delivery Method
- (g) Secondary Desg-Unit
- (h) Res 1 2 3 4
- (i) Bus 5678
- (i) Det Box
- (k) ZIP+4 High
- (I) ZIP+4 Firm

- (a) This is the time used to perform functions on the street that are non-delivery functions, such as; refreshing mail, deadheading, driving to and from the route, etc..
- (b) This is the time used to actually deliver the mail on the street.
- (c) PD's are Possible Deliveries; these are the actual number points (boxes) the mail is delivered to. The count is the number of these locations.
- (d) The number of deliveries actually made during the Route Inspections.
- (e) The PS Form 1621 c is a form, which allows the Postal Service to monitor the Possible Deliveries on a regular basis and add or delete deliveries as required.

- (f) This allows the Route Examiner to indicate the delivery method used (how work is being performed) for the different delivery territory. Examples of the methods that the examiner will indicate are; park, loop, vehicle, etc..
- (g)This is used to indicate secondary type addresses like apartment or suite numbers.
- (h)These are the types of residential deliveries.
 - 1- Other (single boxes not covered in the other categories)
 - 2- Curbline (boxes that can be serviced from the vehicle)
 - 3- NDCBU (Neighborhood Delivery and Collection Box Units centralized delivery points)
 - 4- Centralized (other types of centralized delivery point not NDCBU's)
- (i) These are the types of Business deliveries.
 - 5- Other (single boxes not covered in the other categories)
 - 6- Curbline (boxes that can be serviced from the vehicle)
 - 7- NDCBU (Neighborhood Delivery and Collection Box Units centralized delivery points)
 - 8- Centralized (other types of centralized delivery point not NDCBU's)
- (i) This is the number of Detached delivery box units serviced.

- (k) If the delivery location has a unique ZIP+4 code because it is a High Rise type of building the code will be entered there.
- (I) If the delivery location has a unique ZIP+4 code for a Firm the code will be entered there.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

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